U.S. Patent No. 7,162,486			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
1	"file attributes"	PROPOSED CONSTRUCTION: No construction necessary, plain and ordinary meaning. To the extent the Court deems a construction necessary, the term means properties of a file.  INTRINSIC EVIDENCE  • See 1:59-2:10; 3:43-47; 7:13- 27; 13:23-26; 14:27-34; 15:2-4.  EXTRINSIC EVIDENCE  • Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.  • NetApp reserves the right to rely on any evidence identified by Sun.	PROPOSED CONSTRUCTION: "information descriptive of an associated file"  EVIDENCE:  • '486 Patent at Abstract, Col. 2:59-66; Col. 7:28-49; Col. 8:4-25; Col. 11:23-26, 56-67; Col.12:1-6, 17-23, 41-56; Col.13:4-25; Col.14:20-31, 50-67; Col.15:1-4, 36-46; Fig. 8 and accompanying text.  • '654 Patent Prosecution History, Notice of Allowability dated June 5, 2003.  • '486 Patent Prosecution History, Submission filed on or about September 8, 2003, and references cited therein.  • '486 Patent Prosecution History, Office Action mailed 6,21,2006, and references cited therein.  • '486 Patent Prosecution History, Submission filed on or about August 1, 2006, and references cited therein.  • '486 Patent Prosecution History, Notice of Allowability mailed September 8, 2006.  • file attributes: the name and other identifiable properties of a file. THE IEEE STANDARD DICTIONARY OF ELECTRICAL AND ELECTRONICS TERMS, SIXTH ED. (IEEE Std 100-1996), p.406.  • Testimony by experts called by Sun, including Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.  • Sun reserves the right to rely on any evidence identified by NetApp.
1, 2, 5, 9, 36	"stream inode"	<b>PROPOSED CONSTRUCTION:</b> Data structure for storing attribute information for a stream.	<b>PROPOSED CONSTRUCTION:</b> "a unique structure for storing file attribute information for a file, different from a file inode or directory inode."

U.S. Patent No. 7,162,486			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<ul> <li>INTRINSIC EVIDENCE</li> <li>See Abstract; Fig. 8 and accompanying text; 2:51-60; 3:22-56; 10:57-62; 12:57-15:4.</li> <li>EXTRINSIC EVIDENCE</li> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.</li> <li>NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	EVIDENCE:          • '486 Patent at Abstract, Col. 1:20-22, 42-47, 59-67; Col. 2:1-5, 24-32, 46-67; Col. 3:1-56; Col. 6:54-67; Col. 7:1-6; 28-49; Col. 8:4-25; Col. 10:62-67; Col. 11:23-26, 56-67; Col. 12:1-6, 17-23, 41-56, 63-67; Col. 13:1-25; Col. 14:20-31, 50-67; Col. 15:1-4, 36-46; Fig. 8 and accompanying text.          • '654 Patent Prosecution History, Notice of Allowability dated June 5, 2003.          • '486 Patent Prosecution History, Submission filed on or about September 8, 2003, and references cited therein.          • '486 Patent Prosecution History, Office Action mailed 6,21,2006, and references cited therein.          • '486 Patent Prosecution History, Submission filed on or about August 1, 2006, and references cited therein.          • '486 Patent Prosecution History, Notice of Allowability mailed September 8, 2006.          • Testimony by experts called by Sun, including Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.          • Sun reserves the right to rely on any evidence identified by NetApp.
1, 2, 5, 9	"file inode"	<ul> <li>PROPOSED CONSTRUCTION: Base inode of a file.</li> <li>INTRINSIC EVIDENCE</li> <li>See Abstract; 2:59-3:56; 11:47-12:40; 13:19-23; 14:17-15:14.</li> </ul>	PROPOSED CONSTRUCTION: "a structure containing default data defined by a user application or pointers to data defined by a user application"  EVIDENCE:
		<ul> <li>EXTRINSIC EVIDENCE</li> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.</li> </ul>	• '486 Patent at Abstract, Col. 1:20-22, 42-47, 59-67; Col. 2:1-5, 24-32, 46-67; Col. 3:1-56; Col. 6:54-67; Col. 7:1-6; 28-53; Col. 8:4-25; Col. 10:62-67; Col. 11:23-26, 56-67; Col.12:1-6, 17-23, 41-56, 63-67; Col.13:1-25; Col.14:20-31, 50-67; Col.15:1-4, 36-46; Fig. 8 and accompanying text.

Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		NetApp reserves the right to rely on any evidence identified by Sun.	<ul> <li>'654 Patent Prosecution History, Notice of Allowability dated June 5, 2003.</li> <li>'486 Patent Prosecution History, Submission filed on or about September 8, 2003, and references cited therein.</li> <li>'486 Patent Prosecution History, Office Action mailed 6,21,2006, and references cited therein.</li> <li>'486 Patent Prosecution History, Submission filed on or about August 1, 2006, and references cited therein.</li> <li>'486 Patent Prosecution History, Notice of Allowability mailed September 8, 2006.</li> <li>Testimony by experts called by Sun, including Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.</li> <li>Sun reserves the right to rely on any evidence identified by NetApp.</li> </ul>
36	"files associated with a plurality of inodes"	PROPOSED CONSTRUCTION: No construction necessary, plain and ordinary meaning.  INTRINSIC EVIDENCE	PROPOSED CONSTRUCTION: "every file has a first inode and a second inode as a stream inode"  EVIDENCE:
		<ul> <li>See Abstract; Fig. 8 and accompanying text; 1:40-42; 2:44-58; 13:19-49; 14:50-15:14.</li> <li>EXTRINSIC EVIDENCE</li> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.</li> <li>NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	• '486 Patent at Abstract, Col. 1:20-22, 42-47, 59-67; Col. 2:1-5, 24-32, 46-67; Col. 3:1-56; Col. 6:54-67; Col. 7:1-6; 28-53; Col. 8:4-25; Col. 10:62-67; Col. 11:23-26, 56-67; Col. 12:1-6, 17-23, 41-56, 63-67; Col. 13:1-25; Col. 14:20-31, 50-67; Col. 15:1-4, 36-46; Fig. 8 and accompanying text; claims 1, 5, 9, 36. • Testimony by experts called by Sun, including Dr. McKusick concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent. • Sun reserves the right to rely on any evidence identified by NetApp.

U.S. Patent No. 7,162,486			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
21, 23	"stream directory"	<ul> <li>PROPOSED CONSTRUCTION: Data structure capable of containing information about one or more stream inodes.</li> <li>INTRINSIC EVIDENCE <ul> <li>See Fig. 8 and accompanying text; 11:30-12:56; 14:50-15:4.</li> </ul> </li> <li>EXTRINSIC EVIDENCE <ul> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.</li> </ul> </li> <li>NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	PROPOSED CONSTRUCTION: Sun contends this term does not require construction because the term is clear on its face. However, if the Court decides the construe this term, the term should be construed to mean: "data structure containing information about one or more stream inodes."  EVIDENCE:  • '486 Patent at Col. 2:46-67; Col. 3:1-56; Col. 6:54-67; Col. 7:1-6; 28-49; Col. 8:4-25; Col. 9:23-67; Col. 10:1-7; 62-67; Col. 11:1-67; Col. 12:1-6, 17-23, 41-56, 63-67; Col. 13:1-25; Col. 14:50-67; Col. 15:1-14, 36-46; Fig. 8 and accompanying text.  • '654 Patent Prosecution History, Notice of Allowability dated June 5, 2003.  • '486 Prosecution History, Submission filed on or about September 8, 2003, and references cited therein.  • '486 Patent Prosecution History, Office Action mailed 6,21,2006, and references cited therein.  • '486 Patent Prosecution History, Submission filed on or about August 1, 2006, and references cited therein.  • '486 Patent Prosecution History, Notice of Allowability mailed September 8, 2006.  • Testimony by experts called by Sun, including Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.  • Sun reserves the right to rely on any evidence identified by NetApp.
2, 36, 37	"reference"	<ul> <li>PROPOSED CONSTRUCTION: A direct or indirect pointer.</li> <li>INTRINSIC EVIDENCE</li> <li>See Abstract; 2:66-3:7; 3:15-17; 3:39-43; 7:37-49;</li> </ul>	PROPOSED CONSTRUCTION: Sun contends this term does not require construction because the term is clear on its face. However, if the Court decides the construe this term, the term should be construed to mean: "a pointer which is a block address."

U.S. Patent No. 7,162,486			
Claim No(s).	Claim Term	NetApp's Proposed Construction and Supporting Evidence	Sun's Proposed Construction and Supporting Evidence
		<ul> <li>7:59-8:3; 10:26-38; 11:1-29; 12:7-40; 13:4-15:4.</li> <li>EXTRINSIC EVIDENCE</li> <li>Dr. Greg Ganger may testify concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.</li> <li>NetApp reserves the right to rely on any evidence identified by Sun.</li> </ul>	EVIDENCE:  • '486 Patent at Abstract, Col. 2:66-67; Col. 3:1,15-19, 37-43; Col. 7:28-67; Col. 8-1-3; Col. 10:8-46; Col. 11:1-29; Col. 12:3-40, 53-67; Col. 12:1-3, 31-35, 55-62; Col.14:11-20, 59-64; Fig. 8 and accompanying text.  • Testimony by experts called by Sun, including Dr. McKusick, concerning the meaning of this term to one of skill in the art in the context of its use in the '486 patent.  • Sun reserves the right to rely on any evidence identified by NetApp.